

FILED

DEC 12 2019

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
PECOS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ABRAHAM CARRASCO GARAY,

Defendant.

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P19CR 905

INDICTMENT

[Vio: 8 U.S.C. § 1324(a)(1)(A) (ii) & (B)(i)
Transportation of Illegal Aliens]

THE GRAND JURY CHARGES:

COUNT ONE

[8 U.S.C. § 1324(a)(1)(A) (ii) & (B)(i)]

That on or about November 29, 2019, in the Western District of Texas, the Defendant,

ABRAHAM CARRASCO GARAY,

knowing and in reckless disregard of the fact that an alien, Elvira Moreno-Corral, had come to, entered, and remained in the United States in violation of law, did transport and move, and attempted to transport and move said alien, by means of transportation or otherwise, for the purpose of commercial advantage and private financial gain.

A violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) & (B)(i).

NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE

I. Forfeiture Statutes Relating to Transportation of Illegal Aliens
[8 U.S.C. § 1324(b) and 18 U.S.C. § 982(a)(6)]

As a result of the foregoing criminal violations set forth above, the United States gives notice to the Defendant PEDRO ANTONIO ACOSTA-RAMIREZ of its intent to seek the forfeiture of the below-described property upon conviction and as part of any sentence pursuant to FED. R. CRIM. P. 32.2, 8 U.S.C. § 1324(b) as made applicable to criminal forfeiture by 28 U.S.C. § 2461(c), and 18 U.S.C. § 982(a)(6) which state, in pertinent part, the following:

Title 8 U.S.C. § 1324. Bringing in and harboring certain aliens

(b) Seizure and forfeiture.

(1) In general. Any conveyance...that has been or is being used in the commission of a violation of subsection (a), the gross proceeds of such violation, and any property traceable to such conveyance or proceeds, shall be seized and subject to forfeiture.

Title 18 U.S.C. § 982. Criminal forfeiture

(a)(6)

(A) The court, in imposing sentence on a person convicted of a violation of, or conspiracy to violate, section 274(a) . . . of the Immigration and Nationality Act . . . shall order that the person forfeit to the United States, regardless of any provision of State law—

(i) any conveyance...used in in the commission of the offense of which the person is convicted; and

(ii) any property real or personal-

(I) that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of which the person is convicted; or

(II) that is used to facilitate, or is intended to be used to facilitate, the commission of the offense of which the person is convicted.

(B) The court, in imposing sentence on a person described in subparagraph (A), shall order that the person forfeit to the United States all property described in that subparagraph.

II. Personal Property

This Notice of Demand for Forfeiture includes, but is not limited to, the following:

- **\$500.00, more or less in U.S. Currency;**
- **Red F-150 truck.**

A TRUE BILL.

Original signed by the
foreperson of the Grand Jury
FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY:

John Cannizzaro
JOHN CANNIZZARO

Assistant U.S. Attorney